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June 20, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James R. Cho, U.S.M.J.
225 Cadman Plaza East
Courtroom 11D South
Brooklyn, NY 11201-1804

Re: Fidan, *et ano.* v. Istanbul Rego Park, Inc., *et al.*
Case No.: 1:22-cv-2252 (ENV) (JRC)

Dear Judge Cho:

This firm represents the Defendants in this case, and respectfully submits this letter motion for an adjournment of today's conference.

Pursuant to § C(1) of this Court's Individual Practices, Plaintiff respectfully submits that: (1) the conference is today at noon; (2-3) there have been no previous requests for an adjournment of this conference; (4) I wrote to Plaintiffs that I am currently in a trial in Nassau County District Court and was unable to earlier request the instant adjournment because I was away over the weekend; and (5) Defendants do not believe that this request affects any other scheduled Court appearance or deadline.

I also wish to report that I met with the individual Defendants on or about July 6, 2025 and reviewed the revised settlement agreement with them. However, they did not sign the agreement on this date. I have since spoken to both of them and they are prepared to sign. I therefore anticipate submitting a fully executed revised settlement agreement no later than a week from today. I recognize that this request is being made late and apologize to both the Court and opposing counsel. I should be available to appear for a conference in the late afternoon if the Court wishes.

Based on the foregoing, Plaintiff respectfully submits that sufficient good cause and excusable neglect exists for this Court to exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(B).

Defendants thank this Court for its time and attention to this case.

Dated: Jamaica, New York
July 21, 2025

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

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